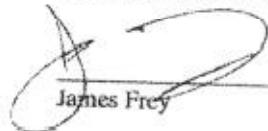


IN WITNESS WHEREOF, the undersigned have caused this Settlement

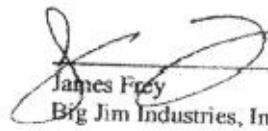
Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:



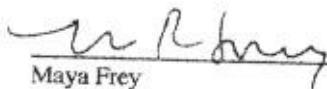
James Frey

Date: 1/2/07



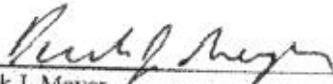
James Frey
Big Jim Industries, Inc.

Date: 1/2/07



Maya Frey

Date: 1/2/07



Derek J. Meyer

Derek J. Meyer
McDermott Will & Emery LLP
227 West Monroe Street, Suite 4400
Chicago, Illinois 60606
Attorney for the Frey Defendants

Date: 1/2/07

FOR THE RANDOM HOUSE DEFENDANTS:

Robert Sorrentino
Senior Vice President, Taxes, Random House, Inc.

Date: _____

Robert Sorrentino
President, Doubleday & Company, Inc.

Date: _____

Robert Sorrentino
Vice President, Taxes, Random House VG, Inc.

Date: _____

Mark B. Blocker
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
Attorney for the Random House Defendants

Date: _____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

James Frey

Date: _____

James Frey
Big Jim Industries, Inc.

Date: _____

Maya Frey

Date: _____

Derek J. Meyer
McDermott Will & Emery LLP
227 West Monroe Street, Suite 4400
Chicago, Illinois 60606
Attorney for the Frey Defendants

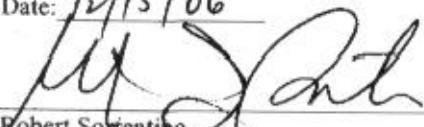
Date: _____

FOR THE RANDOM HOUSE DEFENDANTS:


Robert Sorrentino

Senior Vice President, Taxes, Random House, Inc.

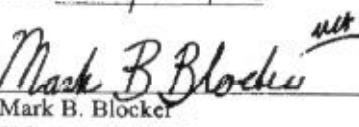
Date: 12/15/06


Robert Sorrentino
President, Doubleday & Company, Inc.

Date: 12/15/06


Robert Sorrentino
Vice President, Taxes, Random House VG, Inc.

Date: 12/15/06


Mark B. Blocker
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
Attorney for the Random House Defendants

Date: 12/20/2006

FOR THE PLAINTIFFS:

Marcia Vedral
Plaintiff Marcia Vedral

Date:

Larry D. Drury
Larry D. Drury
Larry D. Drury, Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date: 12-6-06

Michele Snow

Plaintiff Michele Snow

Date: 12-6-06

Evan J. Smith
Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date: 12-6-06

Plaintiff Jennifer Cohn

Date:

Thomas Mullany
Thomas Mullany
708 Third Avenue, Suite 2500
New York, New York 10017
Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Jennifer Cohn

Date:

Plaintiff Ann Marie Strack

Date:

Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney for Plaintiff Ann Marie Strack

Date:

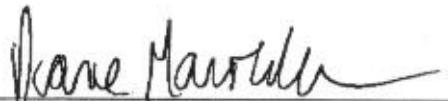
FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date: _____

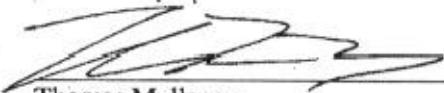
Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date: _____



Plaintiff Diane Marolda

Date: 12/7/06



Thomas Mullaney
708 Third Avenue, Suite 2500
New York, New York 10017
Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Diane Marolda

Date: 12.5.2006

Plaintiff Michele Snow

Date: _____

Evan J. Smith, Esquire
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Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date: _____

Plaintiff Ann Marie Strack

Date: _____

Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney for Plaintiff Ann Marie Strack

Date: _____

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date: _____

Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date: _____

Plaintiff Jennifer Cohn

Date: _____

Thomas Mullaney
708 Third Avenue, Suite 2500
New York, New York 10017
Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Jennifer Cohn

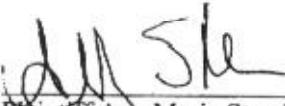
Date: _____

Plaintiff Michele Snow

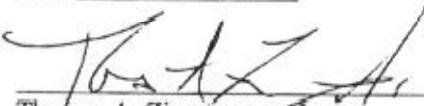
Date: _____

Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
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(610) 667-6200
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date: _____


Plaintiff Ann Marie Strack

Date: 12-8-06


Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney for Plaintiff Ann Marie Strack

Date: 12-11-2006


Plaintiff Jimmy Floyd

Date: 1/4/07

Alan S. Ripka
Napoli Bern Ripka LLP
115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: December 5, 2006

Plaintiff Jill Giles

Date: _____

Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Shera Paglinawan

Date: _____

Michael David Myers
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: _____

Plaintiff Sara Brackenrich

Date: _____

Vincent L. DiTommaso
DiTommaso & Lubin, PC
17W 220 22nd Street, Suite 200
Oakbrook Terrace, Illinois 61081
Attorney for Plaintiff Sara Brackenrich

Date: _____

Plaintiff Jimmy Floyd

Date: _____

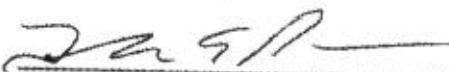
Alan S. Ripka
Napoli Bern Ripka LLP
115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: 11/29/06



Plaintiff Pilar More

Date: 11/29/06



Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Sara Brackenrich

Date: _____

Vincent L. DiTommaso
DiTommaso & Lubin, PC
17W 220 22nd Street, Suite 200
Oakbrook Terrace, Illinois 61081
Attorney for Plaintiff Sara Brackenrich

Date: _____

Plaintiff Jill Giles

Date: _____

Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: _____

Plaintiff Shera Paglinawan

Date: _____

Michael David Myers
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: _____

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
Napoli Bern Ripka LLP
115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: _____

Plaintiff Jill Giles

Date: _____

Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Shera Paglinawan

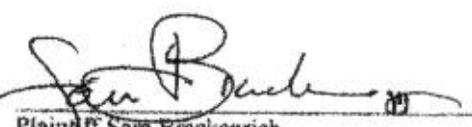
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Plaintiff Wendy Shaw

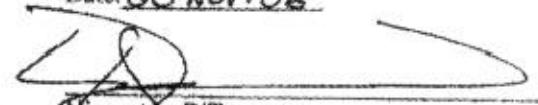
Date: _____

Michael David Myers
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: _____


Plaintiff Sara Brackenrich

Date: 20 Nov. 06


Vincent J. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
Napoli Bern Ripka LLP
115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Sara Brackenrich

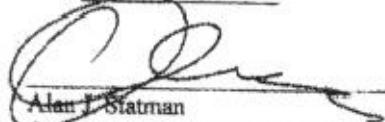
Date: _____

Vincent L. DiTommaso
DiTommaso & Lubin, PC
17W 220 22nd Street, Suite 200
Oakbrook Terrace, Illinois 61081
Attorney for Plaintiff Sara Brackenrich

Date: _____

Jill Giles / by her attorney, A.C. Astor
Plaintiff Jill Giles

Date: 12-7-06


Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: 12-7-06

Plaintiff Shera Paglinawan

Date: _____

Michael David Myers
Myers & Company, P. L. L. C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: _____

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
Napoli Bern Ripka LLP
115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Sara Brackenrich

Date: _____

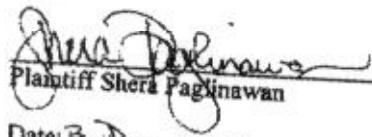
Vincent L. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date: _____

Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: _____


Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

Plaintiff Wendy Shaw

Date: _____


Michael David Myers
Myers & Company, PLLC
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: 12.3.2006

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
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115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: _____

Plaintiff Jill Giles

Date: _____

Alan J. Statman
Colleen M. Hegge (of counsel)
2900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Attorneys for Plaintiff Jill Giles

Date: _____

Plaintiff Pilar More

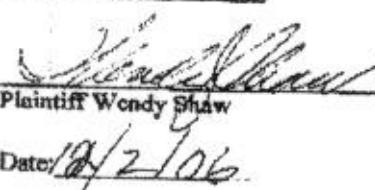
Date: _____

Thomas E. Pakenas
Dale and Pakenas
641 W. Lake Street, Suite 400
Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Shera Paglinawan

Date: _____


Plaintiff Shera Paglinawan

Date: 12/2/06

Michael David Myers
Myers & Company, P.L.L.C.
1809 Seventh Avenue, Suite 700
Seattle, Washington 98101
Attorney for Plaintiff Shera Paglinawan

Date: _____

Plaintiff Sara Brackenrich

Date: _____

Vincent L. DiTommaso
DiTommaso & Lubin, PC